



"COOPERATIVE WHOLESALE ORCHARD SUPPLIES"

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August 3, 2005

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset review, Docket number TM-04-07. Northwest Wholesale Inc. supports the allowance of the following substance:

Lime Sulfur (Calcium Folysulfide), and hydrated lime and elemental sulfur from section 205.601 (e) and (i). Hydrated lime and elemental sulfur are used in the production of Lime Sulfur Solution. Lime sulfur is an essential product used on several thousand acres of apples, grapes, peaches, blueberries, and other tree and vine crops to control fungus, mites and insects. This product has Organic Materials Review Institute approval and has been used by large and small growers. In some cases lime sulfur is the only available product organic growers have to control the above pests. Lime sulfur also is one of the only consistent products that we use in our chemical thinning programs. The results we have achieved for the last two years in apple thinning have been excellent. Our pear growers both organic and conventional use this product to help control rust mite. It is a great tool that we need. Lime sulfur has been used successfully for about 200 years with no recorded form of registance.

If I can be of any further assistance in this matter please feel free to contact me.

Sincerely,

Nathan Squires Head of fieldstaff Northwest Wholesale, Inc.